



April 16, 2024

***Via E-Mail and Certified Mail***

Karen Gork  
Chief Environmental Health Specialist  
Los Angeles County Department of Public Health  
Local Enforcement Agency  
Environmental Programs Division  
5050 Commerce Drive,  
Baldwin Park, California 91706  
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**Re: Chiquita Canyon, LLC's Second Revised Written Plan  
Regarding the Documentation and Tracking of Cover Issues  
for LEA Mitigation Measure #2B**

Dear Ms. Gork:

On December 6, 2023, Chiquita submitted to the Los Angeles County Department of Public Health, acting as the Local Enforcement Agency ("LEA"), a written plan for documenting and tracking fissures, settlement, and tension cracks in the landfill soil cover. The LEA responded on December 14, 2023, and requested that Chiquita submit by December 21 a revised written plan that would incorporate additional elements, including the documentation and tracking of issues related to the geosynthetic cover, actions taken to address any identified issues, and a photo log of observations with before and after pictures. Chiquita submitted the revised written plan as requested on December 21, 2023.

The LEA requested on March 22, 2024 additional revisions to the revised written plan. Specifically, the LEA requested that Chiquita 1) add a log with summary and a map to track the documented fissures and tension cracks and to identify trends, and evaluate the documented series of fissures and tension cracks reported (in particular, certain cracks and fissures reported on February 6, 2024, March 12, 2024, and March 19, 2024); and 2) include methods that will be used to track the instability in the reaction area that is obscured by the geomembrane cover.

This letter provides Chiquita's second revised written plan for documenting and tracking cover issues.

## **Documenting and Tracking Fissures and Tension Cracks**

Chiquita staff will continue to visually monitor the reaction settlement area each operating day for fissures and tension cracks. If a fissure or tension crack in the soil cover is observed, the observing staff member will estimate its grid location, longitude and latitude, length, orientation, horizontal offset (i.e., width), and vertical offset (i.e., height difference). Actions taken to address these fissures or tension cracks, such as tracking over the area and adding small amounts of water when necessary, will be included in the daily log. Chiquita staff will also take before and after pictures of the fissure or tension crack and include the pictures in the daily log entry. Chiquita will collect and compile these notes, pictures, and other relevant observations into weekly reports and, upon approval of this written plan, will submit these weekly reports to the LEA by each Tuesday.

On a monthly basis, Chiquita will provide an evaluation of significant fissures or tension cracks documented over the course of the previous month. Whether a fissure or tension crack is significant depends on whether it: (1) is 100 feet or longer in length; (2) has a horizontal offset (i.e., width) of 0.5 inches or more when the fissure/crack is at least 50 feet in length; or (3) has a vertical offset (i.e., height difference) of 0.5 inches or more when the fissure/tension crack is at least 50 feet in length or there are multiple fissures/tension cracks oriented in the same direction. The evaluation will include a summary data table providing the location, date, length, orientation, and horizontal and vertical offsets of significant fissures or tension cracks; an identification of any trends observed in the data; and a summary map documenting significant fissures and/or cracks.

Chiquita will begin collecting the above-described data on significant fissures and cracks following the LEA's approval of this second revised written plan. The evaluation of the previous month's data will be included in the weekly report submitted to the LEA on the second Tuesday of each month. Chiquita will include in its first submission an evaluation of the 200-foot-long tension crack in map grids 178 and 185 reported on February 6, 2024, the 100-foot-long tension crack in map grids 178 and 185 reported on March 12, 2024, and any significant fissures noted on the March 19, 2024 report.

Additionally, on a monthly basis, Chiquita staff will prepare a profile of the western slope of the landfill. This profile will consist of two cross-sections of the western slope; the first cross-section from the beginning of the month and the second from the end of the month. This profile will be included with the above-described monthly evaluation.

## **Documenting and Tracking Settlement**

Chiquita documents and tracks settlement of the soil cover by drone. Drone flyovers are conducted every other week, weather permitting. Any settlement is measured in cubic yards at a fixed location. The drone captures settlement of over half a foot. Upon receipt of the drone flyover data, Chiquita will incorporate this information into the report it submits to the LEA for the following week.

Where settlement impacts the geosynthetic cover or other aspects of operations (i.e., cover requires additional support, repair, or to maintain drainage), Chiquita will document actions taken

to address these issues, such as adding soil to address settlement or mobilizing a liner crew to repair damaged liner. This documentation will be included in the weekly reports to the LEA.


### **Documenting and Tracking Issues with the Geosynthetic Cover**

Chiquita staff will continue to visually monitor the geosynthetic cover over the reaction settlement area each operating day for issues, such as tears, movement, and where fill might be needed to support the liner and maintain drainage and will make notations on observed issues. Actions taken to address any observed issues, such as repair of the geosynthetic cover, ballooning, or adding soil to address drainage and ballooning will also be included in the daily log. Chiquita staff will also take before and after pictures of the observed issues and include the pictures in the daily log entry. Chiquita will collect and compile these notes, pictures, and other relevant observations into the weekly reports discussed above.

To track potential instability of the reaction area that may be obscured by the geosynthetic cover, Chiquita staff will also inspect the geosynthetic cover for anomalous areas of cover damage or deformation that may indicate underlying instability. Chiquita staff will closely inspect the upper and bottom edges of the geomembrane cover for signs of a downslope tension crack at the top of the slope or bulging at or near the toe of the slope. Chiquita staff will also visually inspect equipment that vertically penetrates the geosynthetic cover (e.g., landfill gas wells, temperature probes) and assess any movement of such equipment over time. Tilting of the equipment (either upslope or downslope, depending on location) can be evidence of underlying translational or rotational movement of the reaction area. Chiquita will collect and compile notes on these visual observations into the weekly reports discussed above.

Chiquita staff will also evaluate the reaction area under the geosynthetic cover during its bi-weekly drone propeller flyovers. Chiquita's experts on slope stability have noted that propeller topographic surveys provide an effective means to assess the type and magnitude of slope movements. Although the geomembrane cover may reduce the sensitivity and resolution of the measurements, site propeller surveys effectively track deformation near the bottom of the scrim-covered western slope and this information is currently being used to assess possible underlying movement. Upon receipt of the drone flyover data, Chiquita will incorporate these notes and observations into the report it submits to the LEA for the following week.

Please do not hesitate to contact me in the event you have any questions about this written plan.

Regards,  
  
Steve Cassulo  
District Manager  
Chiquita Canyon, LLC

Ms. Karen Gork  
Los Angeles County Department of Public Health, Local Enforcement Agency  
April 16, 2024  
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cc: Mark Como, Department of Public Health  
Eric Morofuji, Department of Public Health